



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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MEMORANDUM

TO: The Commission

FROM: Lisa Stevenson
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BY: Kathleen Guith *KG*
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SUBJECT: MURs 7005 and 7056 (Adam H. Victor, *et al.*)

RE: Circulation of Discovery Documents

On October 25, 2016, the Commission found reason to believe that Adam H. Victor and his company, TransGas Development Systems, LLC, each violated 52 U.S.C. § 30116(a) or 30118(a), and 30122 in connection with alleged contributions in the name of another to two political committees, Manchin for West Virginia and Friends of Herman Cain. The Commission also authorized the use of compulsory process, as necessary, to investigate the potential violations. *See* Amended Certification, MURs 7005/7056 (Oct. 26, 2016).

Given the short amount of time left within the statute of limitations—approximately five to seven months, absent additional tolling—we are forgoing informal means of investigation and seek approval of ten subpoenas, one addressed to Adam H. Victor, the alleged source of funds used to make contributions in the name of another, and nine to the alleged conduits.¹

¹ The alleged conduits are Victor family members Jo-Ann Bruggemann, Adam Victor, Jr., Alexia Victor, Alicia ("Alia") Victor, and Jo-Ayla Victor, and non-family members Garry Coulter, Marta Dani (formerly Marta Grabowska), Nana Yoshioka, and Randall Harris.

The subpoenas ask for materials related to payments made by Victor and his companies to the alleged conduits near the time of the contributions and materials related to the contributions themselves. Further, the subpoenas ask Victor to answer under oath whether he made contributions in the name of another and ask the alleged conduits to answer under oath whether their contributions were made from their own funds and whether funds were provided to them by another person to make contributions.

We ask that the Commission approve these subpoenas on a 48-hour no-objection basis. We intend to serve the subpoenas with the Commission's reason to believe letters.

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